

Central Valley Regional Water Quality Control Board

10 April 2015

FILE

**NOTICE OF VIOLATION**

Larry Bright, Manager  
Valley Water Management Company  
7500 Meany Avenue  
Bakersfield, CA 93308

**CERTIFIED MAIL**  
**7012 2920 0000 1430 0359**

**INSPECTION REPORT – VALLEY WATER MANAGEMENT COMPANY, RACE TRACK HILL,  
EDISON OIL FIELD, KERN COUNTY**

Central Valley Regional Water Quality Control Board staff (Staff) inspected the Race Track Hill wastewater disposal facility (Facility) on 27 March 2015. Disposal operations at the Facility are regulated by Waste Discharge Requirements Order 58-439 (WDRs). Staff's observations and comments are presented in the enclosed inspection report.

Staff observed 27 surface impoundments (ponds) being used for evaporation and percolation of oil field production wastewater. Animal burrowing beneath the fence surrounding Cleaning Pond 1 (CP-1) has left openings that need to be repaired. Additionally oil sheens were observed in CP-2 and CP-3.

The openings in the screening surrounding CP-1 and the oil observed in CP-2 and CP-3 are violations of the Water Quality Control Plan for the Tulare Lake Basin Second Edition 2004 (Basin Plan), which states that ponds used for the disposal of oil field wastewater must either be free of oil or effectively covered or screened to preclude entry of birds or animals (Basin Plan, section IV-15, page 41).

Maintenance is needed to close the burrowing holes under the fencing at CP-1 and the oil must either be removed from CP-2 and CP-3 or else these ponds need to be fenced and netted.

Additionally staff noticed that freeboard within pond 10 was insufficient (less than 1 foot) although the present WDRs do not prescribe a minimum freeboard, maintenance to prevent waters from overtopping the impoundment around pond 10 is advisable.

**By 15 May 2015**, please submit a documentation, including before and after photos, describing measures completed to address the above violations.

If you have any questions regarding this inspection, please contact Zachary Jarvie at (559) 445-5455 or by email at [Zachary.Jarvie@waterboards.ca.gov](mailto:Zachary.Jarvie@waterboards.ca.gov).



DANE S. JOHNSON  
Senior Engineering Geologist  
Professional Geologist No. 4239

Enclosure: Inspection Report

cc: Mike Toland, California Division of Oil, Gas and Geothermal Resources, Bakersfield  
Jeffrey Single, California Department of Fish and Wildlife, Fresno

5F  
OFFICE  
58-349  
ORDER NO.

5D152013013  
WDID  
142624  
REG MEASURE ID

## FACILITIES INSPECTION REPORT

NON-15  
PROGRAM  
49654  
PARTY ID

1/4  
PAGE NO.  
222241  
PLACE ID

<b>VALLEY WATER MANAGEMENT COMPANY</b> DISCHARGER NAME <b>7500 MEANY AVENUE</b> STREET ADDRESS <b>BAKERSFIELD, CA 93308</b> CITY, STATE, ZIP CODE <b>LARRY BRIGHT</b> DISCHARGER CONTACT PERSON <b>(661) 410-7500</b> TELEPHONE NO. <b>lbright@vwwater.com</b> E-MAIL ADDRESS	<b>EDISON OIL FIELD, RACETRACK HILL FACILITY</b> FACILITY NAME <b>W 1/2 SECTION 24, T29S, R29E, MDB&amp;M</b> STREET ADDRESS <b>EDISON, KERN COUNTY</b> CITY, STATE, ZIP CODE <b>RUSSELL EMERSON</b> FACILITY CONTACT PERSON <b>(661) 978-0982</b> TELEPHONE NO. <b>remerson@vwwater.com</b> E-MAIL ADDRESS
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### GENERAL INSPECTION INFORMATION

Inspection Type: B Type Compliance Inspection Lead Inspector: Zachary Jarvie

3/27/2015 to 3/27/2015 10:45AM-01:30PM Clear Sunny

INSPECTION DATE(S) INSPECTION TIME GENERAL WEATHER CONDITIONS

#### INSPECTION ATTENDEE(S)

<u>Zachary Jarvie</u> NAME <u>Russell Emerson</u> NAME  NAME	<u>Regional Water Board</u> COMPANY/AGENCY <u>Valley Water Management Co.</u> COMPANY/AGENCY  COMPANY/AGENCY	<u>(559) 445-5455</u> TELEPHONE NO. <u>(661) 978-0982</u> TELEPHONE NO.  TELEPHONE NO.	<u>Zachary.Jarvie@waterboards.ca.gov</u> E-MAIL ADDRESS <u>remerson@vwwater.com</u> E-MAIL ADDRESS  E-MAIL ADDRESS
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### INSPECTION SUMMARY (for CIWQS entry – 500 character maximum)

The Racetrack Hills Facility was inspected to determine compliance with Waste Discharge Requirements Resolution 58-349 (WDRs). There are 27 ponds on the facility that are used for disposal of oil field production wastewater. The following violation of the WDRs were noted; Insufficient netting. No spraying of wastewater outside of the designated disposal ponds was observed.

### INSPECTION VIOLATIONS SUMMARY (if applicable)

Identify VIOLATIONS noted during inspection in table below. For each violation documented entered into CIWQS, identify Violation ID and Violation Type, describe violation, and identify section of the WDRs or Water Code violated.

Label	Violation ID	Violation Type	Violation Description	Section of the WDRs Violated
V1	988961	Basin Plan Prohibition	Oil in impoundments not covered with netting	Water Quality Control Plan for the Tulare Lake Basin Second Edition 2004 (section IV-15, page 41)

### OTHER VIOLATIONS (if applicable)

SMR violations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Evaluated	Notes: The SMR review will be addressed in a separate cover.
File Review violations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Evaluated	Notes: The file review will be addressed in a separate cover.

Lead Inspector ID: 549144 Signature: Z Jarvie Date: 4/10/2015

Inspection Tracking Information Reviewed by: (1) [Signature] (2) [Signature] (3) [Signature]  
CIWQS Coordinator

Filename: VALLEY WATER MANAGEMENT COMPANY  
SEC 24 FACILITY, EDISON OIL FIELD CIWQS Entry Date: 4/10/2015 CIWQS Inspection ID: 20016590

## FACILITY INFORMATION

Oil field production wastewater disposal facility.

FACILITY DESCRIPTION (e.g., total area in acres, number of waste management units, etc.)

Oil field production wastewater.

WASTE TYPES

Surface impoundments.

DISPOSAL DESCRIPTION (e.g., composting, landfill, surface impoundment, etc.)

Active

STATUS (active, inactive, closed)

Oil/Gas Extraction

FACILITY CLASSIFICATION

## BACKGROUND

The Racetrack Hill facility is regulated under Waste Discharge Requirements Resolution 58-349 (WDRs). The facility contains 27 unlined ponds and an irrigation sprinkler system that has been used for the disposal of wastewater. The facility was last inspected on 18 September 2013. The 2013 inspection observed the use of the irrigation sprinkler system to dispose of high-salinity wastewater and noted that this was a violation of WDRs.

## INSPECTION GIS DATA

Description of Measured Point	Latitude	Longitude	Datum	Comments
Centroid of Facility	35.392863	-118.821173	NAD 83	

## INSPECTION OBSERVATIONS AND FINDINGS

Describe observations and findings and identify those that document and reference each violation listed in the Inspection Violations Summary table by identifying the cited violation number within parentheses following the observation/finding (e.g., Exposed waste on top deck (V1)).

The facility was inspected to observe current wastewater disposal operations and evaluate compliance with the WDRs. Photographs were taken to document conditions observed. Attachment 1 is an aerial view of the Racetrack Hill Facility.

Staff observed that oilfield produced wastewater was being discharged into twenty seven unlined ponds within the facility. No spraying of wastewater outside of the designated disposal ponds was observed.

Wastewater is pumped from the Valley Water Management's Fee 34 facility into Cleaning Pond 1 (CP-1). From the Cleaning Ponds (CP-1, CP-2 & CP-3) wastewater is piped into the disposal ponds (Ponds 1 through 24) which feed into one another in a downhill series. Field readings for the Temperature, pH and Electrical Conductivity (EC) were taken in several of the ponds. EC is measured in microsiemens per centimeter ( $\mu\text{S}/\text{cm}$ ).

- CP-1 contains wastewater and oil
  - The pond is fenced and netted. However, animal burrowing appears to have opened up several gaps between the ground surface and the screened fencing (Photos 1 & 2). Maintenance is needed to close these gaps
  - Freeboard appears adequate
- CP-2 & CP-3 each contain wastewater and that had minor visible oil (Photos 3 & 4)
  - These ponds have no netting or fencing
  - Freeboard appears adequate
  - Field readings of wastewater taken from the cleaning ponds were as follows;
    - CP-2: EC 5,433  $\mu\text{S}/\text{cm}$ , pH 7.49, Temperature 23.3 °C
    - CP-3: EC 5,475  $\mu\text{S}/\text{cm}$ , pH 7.59, Temperature 24.0 °C
- Ponds 1 through 24 all contained wastewater and were each free of visible oil
  - Ponds 1 through 24 had no individual fencing or netting
  - Pond 10 has inadequate freeboard on its northeast corner and was in danger of overflowing into the roadway (Photos 5 & 6). All other ponds appeared to have adequate freeboard
  - Field readings of wastewater taken from disposal ponds were as follows;
    - Pond 1: EC 5,235  $\mu\text{S}/\text{cm}$ , pH 8.16, Temperature 22.9 °C
    - Pond 5: EC 5,818  $\mu\text{S}/\text{cm}$ , pH 8.29, Temperature 21.9 °C
    - Pond 10: EC **12,050  $\mu\text{S}/\text{cm}$** , pH 7.81, Temperature 24.5 °C
    - Pond 13: EC 5,381  $\mu\text{S}/\text{cm}$ , pH 8.67, Temperature 25.5 °C
    - Pond 19: EC 5,392  $\mu\text{S}/\text{cm}$ , pH 8.04, Temperature 25.2 °C
    - Pond 20: EC 7,424  $\mu\text{S}/\text{cm}$ , pH 8.73, Temperature 29.7 °C

**SAMPLING INFORMATION AND OBSERVATIONS**

Were samples collected during the inspection? ☐ Yes ☒ No  
Did discharger collect split samples? ☐ Yes ☒ No

Are sample results included in report? ☐ Yes ☒ No

**SAMPLE COLLECTION INFORMATION AND OBSERVATIONS**

SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.

**DISCUSSION OF SAMPLING RESULTS**

Discuss sampling results (e.g., discuss whether sampling results show compliance with WDRs).

No samples were collected.

**CONCLUSIONS**

Summarize the conclusions of the inspection(s) below.

1. The Water Quality Control Plan for the Tulare Lake Basin Second Edition 2004 (Basin Plan), states that ponds used for the disposal of oil field wastewater must either be free of oil or effectively covered or screened to preclude entry of birds or animals (Basin Plan, section IV-15, page 41).
2. The burrowed openings under the fence surrounding Cleaning Pond 1 (CP-1) are a violation of the Basin Plan and need to be repaired.
3. Oily-wastewater observed in CP-2 and CP-3 is a violation of the Basin Plan. The oil in these ponds needs to be removed or the ponds need to be fenced and netted to preclude entry of birds or animals.
4. Pond 10 has inadequate freeboard. The water level in pond 10 needs to be lowered or a berm erected to prevent the water from overtopping and spilling outside of the impoundment.

Attachments Include: Attachment 1: Racetrack Hill Facility

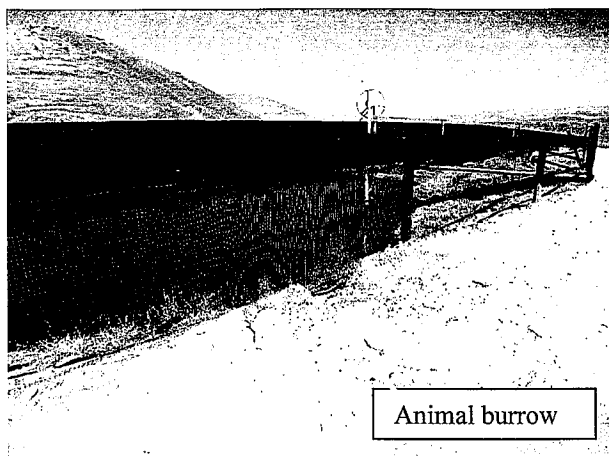


Photo 1. – CP-1 looking northwest

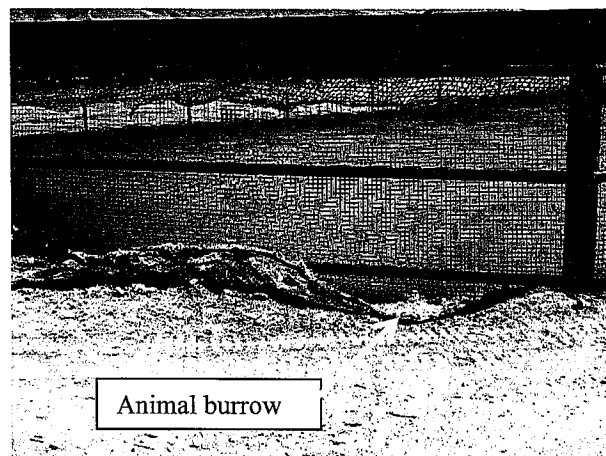


Photo 2. – CP-1 looking northeast

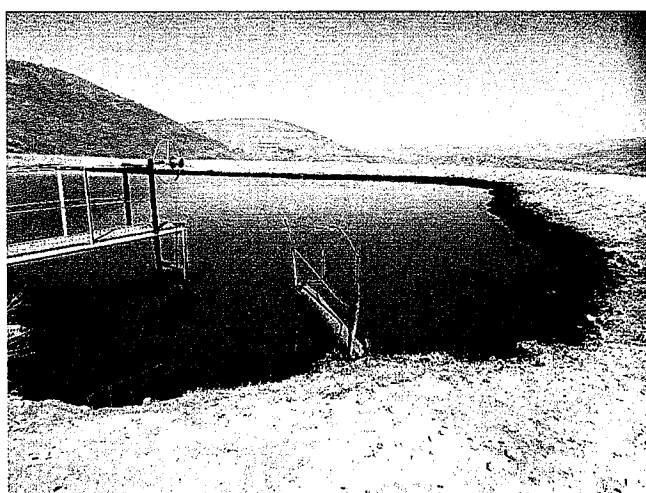


Photo 3. – CP-2 looking northwest

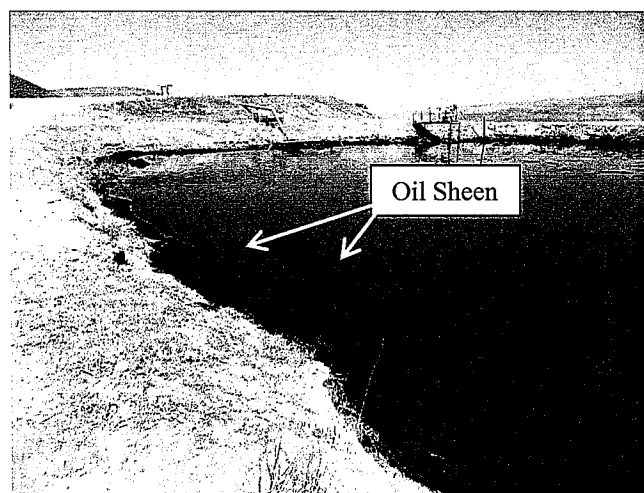


Photo 4. – CP-3 looking northwest

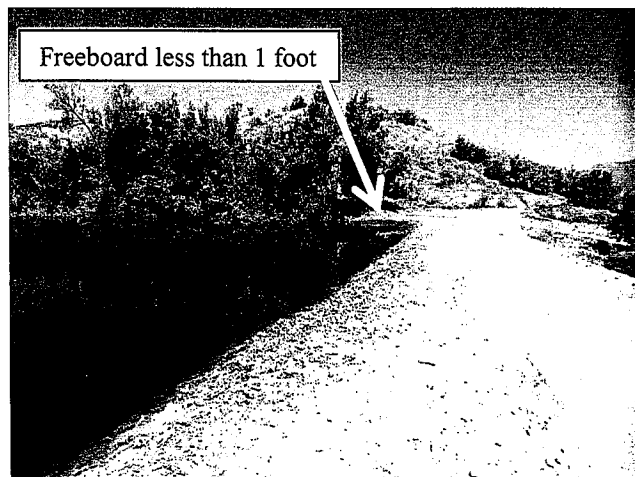


Photo 5. – Pond 10 looking north



Photo 6. – The northeast corner of pond 10



Attachment 1: Racetrack Hill Facility

Map by ZJJ 04/10/2015



Attachment 1: Racetrack Hill Facility

Map by ZJJ 04/10/2015